

ENGINEERING SERVICES - DALLAS  
CODES & TECHNICAL STANDARDS COMMITTEE  
FORMAL INTERPRETATION

REFERENCE NUMBER: 82.224.161.97.11

REFERENCE DOCUMENT: Life Safety Code

LOCATION: Albuquerque IHS Indian Hospital, Albuquerque, NM

QUESTION: A request for a formal interpretation of the Life Safety Code as related to the applicable chapter and edition requirements for health care occupancy (NFPA 101). AAIHS staff has interpreted certain provisions of the subject code to require that the facility be brought up to the standards as established in the 1997 LSC (NFPA 101), Chapter 13, NEW HEALTH CARE FACILITIES.

ANSWER: The construction project was designed under various editions of the Life Safety Code. It is the policy of IHS that any construction project, whether new construction or additions, renovations, alterations, or modernizations are to be designed using the latest Life Safety Code as adopted by IHS headquarters at the time of inception of the design. Therefore, any interpretation of the design and construction of any of the various projects that went into making up the current construction project should be based on the code in effect at that time.

It is the policy of IHS that if the Life Safety Code requirements, standards, or restrictions are reduced in subsequent editions, that these standards or restrictions may be made applicable to the project.

Paragraph 12-1.1.4.5 states (in part): "Renovations, Alterations, and Modernizations shall comply, to the extent practicable, with requirements for new construction in accordance with 1-4.6. ..."

Likewise paragraph 13-1.1.4.5 states (in part): "Renovations, Alterations, and Modernizations shall comply, to the extent practicable, with requirements for new construction in accordance with 1-4.6. ..."

Paragraph 1-4.6 Modernization or Renovation. states "Any


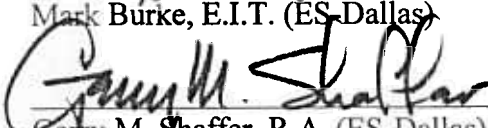
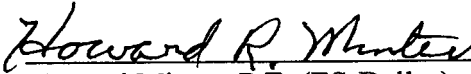

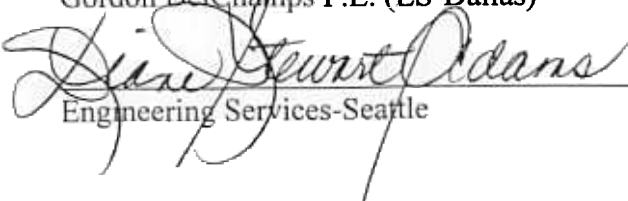
alteration or any installation of new equipment shall be accomplished as nearly as practicable with the requirements for new construction. .... In no case shall the resulting life safety features be less than those required for existing buildings.”

Each of the paragraphs refer to construction work for projects that are additions, renovations, alterations, or modernizations. The construction work as defined in the Scope of Work for the project is required to be designed and constructed to conform to the requirements for new construction for the latest Life Safety Code as adopted by IHS headquarters at the time of inception of the design. Deficiencies noted that are not a part of the Scope of Work for the project are not required to be corrected to bring these deficiencies into compliance.

Comments:

It is not a requirement to bring the facility with a construction project of this magnitude into total compliance with NFPA 101 under the current construction contract. A requirement to upgrade the entire facility to the 1997 Code, Chapter 12 would place an undo hardship on the facility.

Signatures:

<input type="checkbox"/>	Agree	_____ Steven L. Bourn, R.A. (ES-Dallas)	_____ (Date)
<input type="checkbox"/>	Disagree		
<input checked="" type="checkbox"/>	Agree	 Mark Burke, E.I.T. (ES-Dallas)	<u>9-23-97</u>
<input type="checkbox"/>	Disagree		
<input checked="" type="checkbox"/>	Agree	 Gerry M. Shaffer, R.A. (ES-Dallas)	<u>9/22/97</u> (Date)
<input type="checkbox"/>	Disagree		
<input checked="" type="checkbox"/>	Agree	 Howard Minter, P.E. (ES-Dallas)	<u>9/24/97</u> (Date)
<input type="checkbox"/>	Disagree		
<input checked="" type="checkbox"/>	Agree	 Gordon DelChamps P.E. (ES-Dallas)	<u>9/23/97</u> (Date)
<input type="checkbox"/>	Disagree		
<input checked="" type="checkbox"/>	Agree	 Engineering Services-Seattle	<u>10.14.97</u> (Date)